

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

MARCIA GILKES, as grandmother ,  
and legal guardian of Z.A, a minor

Plaintiffs,

Case no. 9:25-CV- 80477-DMM

v.

THE SCHOOL DISTRICT OF PALM  
BEACH COUNTY, SCHOOL BOARD  
OF PALM BEACH COUNTY, MICHAEL  
J. BURKE, in his official capacity as  
Superintendent of the School District of  
Palm Beach County, and in his individual  
capacity, LOXAHATCHEE GROVES  
ELEMENTARY SCHOOL, NANCY NORTON,  
in her individual capacity, and ALAJAH  
TENSLEY, in her individual capacity,

Defendants.

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**MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Defendant, NANCY NORTON, by and through her undersigned counsel respectfully requests this Honorable Court, pursuant to Federal Rule 6 (b) of the Federal Rules of Civil Procedure extend the time for this Defendant to respond to the Complaint filed in this cause and as good cause therefor states:

1. After being served with the Complaint in this matter, the Defendant contacted her counsel to arrange for response.
2. Counsel was out of the State at the time of contact and has just returned to Florida.

3. Immediately upon his return counsel called counsel for the Plaintiff to seek a short extension of time to respond to the pleading.

4. Counsel Rand was not reachable by telephone and a message was left on a recording device for her.

5. Counsel Crump's office was reached by telephone and a representative "Riley" indicated that he would pass on counsel's request and that a response would be forthcoming.

6. The Complaint sounds in six counts against multiple Defendants and includes allegations about which this Defendant has no personal knowledge.

7. Defendant, and particularly counsel for the Defendant require an additional 20 days to investigate and review the allegations of the Complaint in order to properly respond to it.

8. No party will be prejudiced by the granting of the relief sought herein.

9. This motion is made immediately upon counsel's return to the office.

10. Any neglect in this matter should be considered excusable in that the Defendant timely contacted her lawyer and only his absence from the jurisdiction delayed the filing of her response.

**WHEREFORE** Defendant, NORTON requests this Court grant his Motion and extend the time to respond to Plaintiff's Complaint an additional 20 days.

I HEREBY CERTIFY that on the 16<sup>th</sup> day of June, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served on this date on Jasmine Rand, Rand Law Firm, 2525 Ponce de Leon Blvd., Ste 300, Miami FL 33134, and Benjamin Crump, Crump Law Firm, 122 South Calhoun Street, Tallahassee, FL [32301,ben@bencrump.com](mailto:32301,ben@bencrump.com) via transmission

of Notices of Electronic Filing generated by CM/ECF for counsel authorized to receive electronically Notices of Electronic Filing.

/s/ Mark Wilensky  
MARK WILENSKY  
DUBINER & WILENSKY, L.L.C.  
1200 Corporate Center Way, Suite 200  
Wellington, FL 33414  
Telephone (561) 655-0150  
Facsimile (561) 833-4939  
Fla. Bar No. 290221  
E-Service: [office@dubinerwilensky.com](mailto:office@dubinerwilensky.com)